

Exhibit “1”

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DECLARATION OF MARK H. GUNDERSON, ESQ.

I, Mark H. Gunderson, having first been duly sworn, and under penalty of perjury, state as follows:

1. I am over 18 years of age.

2. I am an attorney representing Scotia International of Nevada, Inc., a Utah corporation, Warren Barber, an individual, and Max Barber, an individual, the Defendants in the lawsuit filed in the United States District, District of Nevada, Case Number 2:19-cv-02077-JCM-EJY.

3. This Declaration is made to supplement the Gunderson Law Firm's Motion to Withdraw as Counsel and pursuant to the Court's order to supplement.

4. I was retained in this matter for the purpose of assisting the Defendants in addressing (1) to show cause why they should not be held in contempt and (2) to attempt to set aside the Defendants' deemed admissions to certain Requests for Admissions.

5. It was understood by myself and the Defendants that only if we were successful in avoiding contempt and setting aside the deemed admissions would I continue my representation.

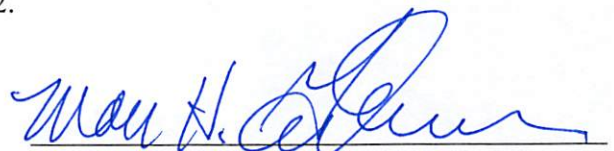
6. Because we were successful in avoiding contempt but our efforts to set aside the deemed admissions were unsuccessful, I have performed the full scope of the engagement for which I was retained.

7. Communications with the Defendants have ceased, and it is difficult to maintain any level of representation of the Defendants. Without reliable timely communication, I will be unable to properly assist the Defendants going forward.

8. Given the current posture of the case, the case is concluded pending dispositive orders from the Court.

9. I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Executed this 15 day of February, 2022.


Mark H. Gunderson, Esq.